

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
JEFFERSON CITY DIVISION

SEMCO, LLC,)
)
)
Plaintiff,)
)
)
v.) Civil Action No. 2:11-cv-04026-FJG
)
)
HUNTAIR, INC.,)
)
)
Defendant.) JURY TRIAL DEMANDED
)

**HUNTAIR, INC.'S CLAIM CONSTRUCTION HEARING
PROPOSED EXHIBIT AND WITNESS LIST**

Pursuant to the Court's Order (Doc. 67), Defendant Huntair, Inc. ("Huntair") hereby submits its proposed witness and exhibits lists for the claim construction hearing.

Huntair's proposed witness list is as follows:

Witness	Testimony
James Tarala	Huntair may call James Tarala to testify about the state of the art as of March 10, 1999, the knowledge of a person of ordinary skill in the art as it pertains to the patent-in-suit, and how such a person would understand the disputed claim terms of the patent-in-suit.

Huntair's proposed exhibit list is as follows:

Exhibit No.	Description
1	Parties' Joint Claim Construction Motion (Doc. 47)
2	Huntair's Opening Claim Construction Brief (Doc. 52)
3	Exhibit 1 to Huntair's Opening Claim Construction Brief (Doc. 52-1), Parties' Joint Claim Construction Motion
4	Exhibit 2 to Huntair's Opening Claim Construction Brief (Doc. 52-2), U.S. Patent No. 6,199,388
5	Exhibit 3 to Huntair's Opening Claim Construction Brief (Doc. 52-3), Presentation of Asserted Claims and Huntair's Proposed Constructions

6	Exhibit 4 to Huntair's Opening Claim Construction Brief (Doc. 52-4), U.S. Patent No. 4,903,503
7	SEMCO's Supplemental Initial Pre Markman Hearing Brief (Doc. 53)
8	Exhibit 1 to SEMCO's Initial Pre Markman Hearing Brief (Doc. 53-1), U.S. Patent No. 6,199,388
9	Exhibit 2 to SEMCO's Initial Pre Markman Hearing Brief (Doc. 53-2), SEMCO's annotated Figure 3C from U.S. Patent No. 6,199,388
10	Exhibit 3 to SEMCO's Initial Pre Markman Hearing Brief (Doc. 53-3), SEMCO's annotated photograph
11	Exhibit 4 to SEMCO's Initial Pre Markman Hearing Brief (Doc. 53-4), U.S. Patent and Trademark Office prosecution history of U.S. Patent No. 6,199,388.
12	SEMCO's Reply Pre Markman Hearing Brief (Doc. 64)
13	Exhibit 5 to SEMCO's Reply Pre Markman Hearing Brief (Doc. 64-1), SEMCO, LLC Claim Differentiation Chart
14	Exhibit 6 to SEMCO's Reply Pre Markman Hearing Brief (Doc. 64-2), Declaration of John C. Fischer, Jr. in Support of SEMCO's Reply to Huntair's Opening Pre-Markman Hearing Brief (d/e 52)
15 - [reserved]	Demonstrative exhibits that excerpt and/or highlight portions of Exhibits 1-14

Huntair reserves the right to object to the introduction of exhibits and testimony offered by SEMCO.

Respectfully submitted,

Dated: October 14, 2011

/s/ Angela G. Nichols
Richard T. McCaulley, Jr. (admitted *pro hac vice*)
Alexander G. Piller (admitted *pro hac vice*)
ROPES & GRAY LLP
111 South Wacker Drive, 46th Floor
Chicago, IL 60606
Telephone: (312) 845-1200
Facsimile: (312) 845-5500
richard.mccaulley@ropesgray.com
alex.piller@ropesgray.com

Mark M. Iba MO #45452
Angela G. Nichols MO #56870
STINSON MORRISON HECKER LLP
1201 Walnut Street, Suite 2900
Kansas City, MO 64106
Telephone: (816) 842-8600
Facsimile: (816) 691-3495
miba@stinson.com
anichols@stinson.com

*Attorneys for Defendant
Huntair, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on October 14, 2011, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which sent notification of such filing to all parties receiving notice by electronic means.

/s/ Angela G. Nichols
Attorney